



DATE: August 31, 1981

TO: Dan Goodwin

FROM: Sy Levine *lv*

SUBJECT: Republic Steel Company Meeting at USEPA on August 25, 1981

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CNG: PAGES 1 & 2  
for MAR 14

A meeting was held at USEPA on August 25, 1981 regarding non-compliance of the Republic Steel, Chicago, blast furnace cast house. Representatives of USEPA, IEPA, CBE and Republic Steel Co. (RSC) were in attendance. Mel Villalobos and I represented the Agency. The attendance list is attached. USEPA is concerned with enforcement of the terms of their federal consent decree. This requires RSC to install controls in the event their stack test failed to demonstrate compliance. IEPA is concerned not only with the compliance of the cast house but also with additional violations, as outlined in our August 5, 1981 letter to RSC, which must be resolved as part of the facility compliance program and project completion schedule required under Illinois law, 203(d) (5) (L) (iii).

IEPA and USEPA technical justification as to reasons for unacceptability of the January 1981 stack test were fairly equivalent, except that USEPA did not examine as we did the statistical variations of test results for characterizing and comparing the 1980 test with the 1981 test. Our outline of these differences was presented with conclusions as to our lack of confidence for accepting their data as representative of day-to-day operations. Opacity leakages and poor purge practice were also discussed.

In reply RSC (William West) alleged that we were "knit picking", that they stood in the forefront of all the steel companies in spending a lot of money over a span of years in attempting to quantify a difficult technical problem -- namely the emissions from a cast house roof monitor, and that we do not show recognition of their efforts and, in fact, even bear down against them more strongly than we do against those facilities who have not made any effort at all to comply with the regulations.

We indicated that the RSC efforts were well noted but that the difficulties and cost in attempting to repeat their testing could have been offset by an expeditious hardware program when we stop to consider that RSC had, over a year ago, completed conceptual studies and drawings for a simple hooding collection system.

Brown then stated that RSC has already, in fact, moved forward with installation of suppression technology. Experimental runner covers were installed and tested on March 24-25, 1981 using the same test procedure used in January, 1981. He said the results in emission reduction were excellent, with an emission rate of only 13.6 lb/hr compared to the 33.4 lb/hr for the January 1981 tests. I stated that we would have observed the tests if we were informed that they were planning this follow-on program. William West replied that the test were strictly for in-house informational purposes. I then asked for a copy of their results. Summary information was provided. It is attached hereto. After briefly examining it I then asked for a more detailed report, containing calculations with



all need back up information, because our interest at the state level was more concerned with mass emission levels as opposed to the USEPA viewpoint concerned more strictly with opacity levels as proof of compliance. They said that they would send us a more detailed report. Peter Kelley requested that USEPA be allowed to observe the cast house operation with the covers. I made a similar request. They are now shut down for repairs until October 1. Covers will be installed by that time and we will be informed in writing ahead of time so we can make our observations. Eventually they plan to cover the tap hole drill area, the trough to skimmer plus the slag runner and iron runner. They believe that with a fully developed engineered system they will even do better than the 13.6 lb/hr measured in March, 1981.

As to the IEPA issues relating to the overall compliance plan they stated:

1. The stack test procedure adopted for the one furnace Q-EOP operation will be conducted in October when they start up the blast furnace.
2. The flue dust catcher system will resemble a drawing they submitted to IEPA as part of their overall compliance plan. They plan to complete the installation during 1981.
3. The ~~scarfing~~ operation stack test at the 44 inch mill does not meet the .03gr/scf level of the regulation 100% of the time. This is their conclusion based on the stack test. We have not seen the results. They plan to meet with the manufacturer of the scrubber and will solicit recommendations for design improvement. They hope to make a decision during 1981. Additional hardware may be necessary to meet the .03 gr/scf standard.
4. They will draft a formal reply to all the issues we raised in our letter of August 5, 1981.

Peter Kelley also requested their written reply summarizing the RSC position on the cast house. He said he would use this as a basis for going into Federal Court to let the judge know that there is continuing dialogue between the parties. IEPA is not a party to this case. It should also be noted that the Illinois test procedure explicitly requires that the stack test be conducted in the presence of a certified observer and that significant emission leakage invalidate the test. This is an interesting open question. We may want to seek additional test verification when their final system is installed.

Results of future investigation and analysis of their latest stack test data will form a basis for conclusions in this matter. We will request that their facility compliance program be formally amended in writing with specific target dates, to reflect their new cast house control technology.

cc: Peter Orlinsky  
Mel Villalobos  
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Tony Telford  
Miles Zamco  
Regional File

8-25-81

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